

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
Division

SAM EDWARD THURMOND SR. Plaintiff

vs. case no.

4:07 CW 1089 gmm/DDy  
Karl Byrd Et. al. Defendant

Motion to amend complaint  
comes now, plaintiff Sam Edward Thurmond sr.  
pursuant to the Fed. Rules of civil procedure  
to amend this complaint and states:

- 1) Faulkner county sheiff dept. allows its officers to practice corporal punishment on inmates being housed in the Faulkner county detention center
- 2) The Faulkner county sheiff dept. allows its employees to inflict cruel and unusual punishment on inmates being housed in the Faulkner county detention center by feeding hazardous and dangerous dietary meals.

3) The Faulkner county detention center employee's denies inmates access to the courts. places inmates in punitive Isolation without a due process hearing or without serving written notice.

4) Employees at the Faulkner county detention center are non-certified and practice medical handout of perscription medication. The Faulkner county detention center also houses inmates in life threatening living conditions, by not screening inmates for "TB" upon entry into the Faulkner county detention center housing units.

5) Grievance procedure; the inmates of the Faulkner county detention center is denied the right to redress serious issues. the officers at the Faulkner county detention center are answering grievances and once the grievance has been answered then appealed, the same officer answers the appeal as well.

WHEREFORE, Plaintiff prays  
that this court will grant  
this motion.

Respectfully Submitted.  
Sam Edward Thurmond  
Sam Edward Thurmond Sr.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
Division

SAM EDWARD THURMOND SR. Plaintiff

VS. Case no.

KARL BEYD ET. AL. Defendant

PROPOSED AMENDED COMPLAINT

COMES NOW, Plaintiff Sam Edward Thurmond pursuant to Fed. Rules of Civ. procedure States the following.

- 1.) The Faulkner county detention center is unlawful inflicting corporal punishment. Inmates of the Faulkner county detention center are compelled to sleep on the floor as a result of overcrowding. (b) all inmates are compelled to sleep on naked concrete without any bed linen. The corporal punishment comes unprovoked.

2) The faulkner county detention center inflicts cruel and unusual punishment on inmates being housed at the faulkner county detention center by feeding a hazardous and dangerous dietary schedule that threatens the life and health expectancy of all inmates confined. The faulkner county detention center kitchen feeds a (3) three course (starch meal) three times a day. The dietary plan in used by the faulkner county detention center is life threatening, and health alarming.

3) The faulkner county detention center denies its inmates access to the courts by not allowing inmates to exercise the right to have access to any legal material or law books and denial of access to the states local media, news paper, and local news. inmates are placed in punitive isolation without a due process hearing, or without written notice and stripped of all constitutional rights to communicate with the courts, family, and the local media.

4) Medical hazards and life threatening living condition. Inmates entering the Faulkner county detention center are not physically examined by a licensed physician or registered nurse and The inmates are confined within a small eightman cell comprised of Thirteen (13) men, of whom none has been tested for "TB" airborne disease. none of the cell blocks in Unit one have "TB" detecting medical lights.

A) Inmates are being administered prescription medication by untrained jail personnel and such action is a direct violation of federal law regarding medical dispense and control.

5) The Faulkner county detention center denies inmates the right to redress serious issues dealing with person's and medical problem. The current Sham of a grievance allows the person or person's whom the grievance is written on, the opportunity to read and destroy the inmate grievance and thereafter retaliate

against the inmates. In some cases cause bodily harm or induce such by other inmates. The grievance procedure currently allows the grievant officer to be the reviewing officer

## Relief Sought

4,500,000.<sup>00</sup> four and one half million Dollars. a court approved affirmative action program to promote equality, A duly certified grievance program. I.e.: Law Library, overcrowding, and medical services.

I declare under the penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of November 2007

Sam Edward Shumard

Sylvester L. Wood

Signature of Plaintiff(s)



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
\_\_\_\_\_ Division

SAM EDWARD THURMOND SR. Plaintiff

VS. CASE NO.

KARL BRYD ET. AL DEFENDANT

MOTION TO ENJOIN

COMES NOW, Plaintiff Sam Edward Thurmond and his motion to enlarge and enjoin co-plaintiff in the above style proceedings to wit;

- 1) James Welspon
- 2) Sylvester Kirkwood

WHEREFORE, the foregoing is hereby prayed.

Respectfully Submitted  
Sam E. Thurmond Sr.  
Sam Edward Thurmond Sr.



## SWORN AFFIDAVIT

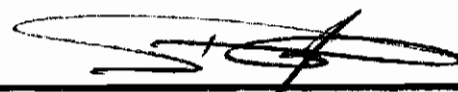
I James A. Welsom III deposes and says that the statement herein is true and correct to the best of my knowledge.

On October 20<sup>th</sup> 2007 I the affiant deposes and swear that I am a inmate of the Faulkner county detention center and thereby enjoin in the style proceedings. Sam Edward Thurmond sr. Et. al vs. Karl Byrd, Sheriff Faulkner county Arkansas.

I am a actual affected person in the custody of Faulkner county Sheriff, et. al

I declare under penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this 6<sup>th</sup> day of Nov. 2007

  
\_\_\_\_\_  
Signature of affiant

## SWORN AFFIDAVIT

I ~~Sylvester Kirkwood~~ depose and says that the Statement herein is true and correct to the best of my knowledge.

on 3-29-2007 I the affiant depose and swear that I am a inmate of faulkner county detention center and thereby enjoin in the style proceedings Sam Edward Thurmond sr. Et. al vs. Karl Byrd, Sheriff, faulkner county Arkansas.

I am a actual affected person in the custody of faulkner county Sheriff, et. al

I declare under penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this 6 day of Nov 2007

Sylvester Kirkwood  
Signature of affiant